

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

CALVIN WESLEY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action: 6:24cv00032
	)	
THE CITY OF LYNCHBURG and	)	
LPD OFFICER SETH REED,	)	
	)	
Defendants.	)	

**ANSWER**

Defendant, City of Lynchburg, Virginia (“Defendant”), by counsel, answers the Complaint as follows:

1. With regard to paragraphs 1-4, Defendant admits that jurisdiction and venue is correct in the Lynchburg Division of the United States District Court for the Western District of Virginia. Defendant denies that this Court has jurisdiction over the state law claims standing alone.

2. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraph 5.

3. Defendant admits the allegations contained in paragraph 6.

4. With regard to paragraph 7, Defendant admits that former Officer—now Sergeant—Seth Reed was a police officer employed by the Lynchburg Police Department at all times relevant to the allegations contained in the Complaint.

5. Paragraphs 8-127 are not directed at Defendant and thus no response is required. To the extent a response is required, Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraphs 8-127.

6. Defendant denies the allegations contained in paragraphs 128-131.
7. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraph 132.
8. Defendant denies the allegations contained in paragraphs 133-135.
9. Paragraphs 136-169 are not directed at Defendant and thus no response is required. To the extent a response is required, Defendant denies the allegations contained in paragraphs 136-169.
10. Defendant denies the allegations contained in paragraphs 170-205.
11. Paragraphs 206-244 pertain to claims that were dismissed by the Court's Order dated June 13, 2025 (ECF 24). Therefore, no response is required.
12. Paragraphs 245-281 are not directed at Defendant and thus no response is required. To the extent a response is required, Defendant denies the allegations contained in paragraphs 245-281.
13. Defendant denies all allegations not expressly admitted herein.
14. Defendant denies that it is indebted or liable to the Plaintiff for the amounts or reasons set forth in the Complaint or any other amounts or reasons whatsoever.
15. Defendant is immune from suit or damages by the doctrines of sovereign and/or governmental immunity.

CITY OF LYNCHBURG

By: /s/ John R. Fitzgerald  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27<sup>th</sup> day of June, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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